

November 20, 2006

U. S. Army Corps of Engineers
Attn: CECW-OR/MVD (David B. Olson)
441 G. Street NW
Washington DC 20314-1000

***Subject: COE-2006-0005/ZRIN 0170-ZA02: Nation Wide Permit D for
Shellfish Aquaculture***

Dear Mr. Olson:

As a farm manager for one of the largest shellfish growers in the country, I support the creation of a permit that will provide coverage for our existing operations. I have been working in Samish Bay, Washington, for approximately 12 years. Prior to that I worked in South Puget Sound in Oakland Bay, Washington, for 13 years. I know first-hand the benefits, both economic and environmental, of shellfish farming. I have seen how the shellfish industry has been instrumental in protecting Puget Sound.

First of all, our shellfish provide critical ecological services. As filter feeds, they are cleaning the water. As a farmer, I work hard to protect the health of our bay by working with local communities on various committees that support a clean and healthy marine environment.

In addition to their ability to filter water, there's a considerable body of research that proves how important shellfish are to the environment in other ways as well, including their ability to take nitrogen out of the water, remove carbon from the atmosphere, and provide critical habitat. I have personally witnessed the benefits on my farm. For example, in areas that I currently work, I have seen how shellfish have improved the tidelands resulting in an increase in birds and fish, in particular and most notably, bald eagles.

Additionally, our company has been a leader in creating and implementing an Environmental Codes of Practice (ECOP) for all of our farms. It is my job to ensure my farm meets or exceeds the standards outlined in our ECOP.

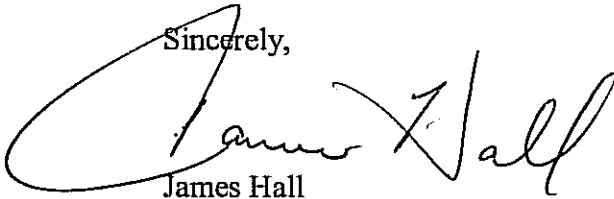
In terms of economic benefits, my farm provides approximately twenty jobs, and sometimes more, that pay between \$9.00 and \$14.00 per hour. This supports family-wage earners in an area that is considered economically depressed because of the decline in other natural resource industries. These people depend on our ability to continue farming as well as being able to expand our existing operations as needed.

Given both the environmental and economic benefits that shellfish farming provides to local, state and the national economy, it makes sense to provide these benign operations with a national permit.

Furthermore, as the science indicates, shellfish are recognized for providing benefits for eelgrass, and they have even been used to enhance eelgrass populations through federally funded projects, so it doesn't make sense to impose restrictions to existing operations that are found to co-habitat with eelgrass beds. I have been farming around eelgrass in Samish Bay since I have been operating there and have seen only increases in eelgrass bed area and density.

Thank you for considering these comments. I hope you will support my ability to continue farming shellfish farms well into the future.

Sincerely,

A handwritten signature in black ink, appearing to read "James Hall". The signature is fluid and cursive, with a large loop at the beginning and a long, sweeping tail.

James Hall
Taylor Resources, Inc.
2182 Chuckanut Drive
Bow, Washington 98232
(360) 708-0094